

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

|                           |   |                    |
|---------------------------|---|--------------------|
| UNITED STATES OF AMERICA, | ) | CASE NO. 8:15CR140 |
|                           | ) |                    |
| Plaintiff,                | ) |                    |
|                           | ) | MOTION FOR         |
| vs.                       | ) | DOWNWARD           |
|                           | ) | DEPARTURE          |
| ALONDRA M. REBOLLEDO,     | ) |                    |
|                           | ) |                    |
| Defendant.                | ) |                    |

COMES NOW the Defendant and moves for a downward departure of her criminal history category calculation for the reason that placing her at a criminal history category V substantially over-represents the seriousness of her criminal history or the likelihood that she will commit other crime.

Paragraphs 52 and 53 involve one point convictions when Ms. Rebolledo was in her early twenties, and are barely within the timeframe allowing their consideration under the sentencing guideline. In both instances, Ms. Rebolledo completed either a drug court/diversion or probation.

For these reasons, this Court should act pursuant to U.S.S.G. §4A1.3(b)(1) and depart downward from the suggested criminal history category set forth in the Revised PSR.

Respectfully submitted,  
ALONDRA M. REBOLLEDO,  
Defendant

s/James J. Regan  
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to Douglas J. Amen, Assistant United States Attorney.

s/James J. Regan